

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
NORRIS, McLAUGHLIN & MARCUS, P.A. Morris S. Bauer, Esq. Joseph R. Zapata, Jr., Esq. Attorneys for the Debtor/Debtor-In-Possession 721 Route 202-206, Suite 200 P.O. Box 5933 Bridgewater, New Jersey 08807 (908) 722-0700	
In Re: PARADIGM EAST HANOVER, LLC, Debtor.	Case No.: 14-25017 (DHS) Judge: Hon. Donald H. Steckroth Chapter: 11

**NOTICE OF VERIFIED MOTION OF PARADIGM EAST HANOVER, LLC FOR THE
ENTRY OF AN ORDER AUTHORIZING THE DEBTOR TO SELL REAL
PROPERTY TO AVALONBAY COMMUNITIES, INC. FREE AND CLEAR
OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. §363**

PLEASE TAKE NOTICE that on January 27, 2015 at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, Paradigm East Hanover, LLC (the “Debtor”) shall move before the Honorable Donald H. Steckroth at the United States Bankruptcy Court for the District of New Jersey, U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for the entry of an order authorizing the Debtor to sell real property to AvalonBay Communities, Inc. free and clear of liens, claims and interests pursuant to 11 U.S.C. § 363 (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the Debtor shall rely upon the Verified Motion filed simultaneously herewith in support of the relief sought and proposed Order. As the issues before the Court are not novel, it is submitted that no brief is necessary pursuant to L.B.R. 9013-2.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and the District of New Jersey Local Bankruptcy Rules, and must be filed with this Court and served upon and received by counsel to the Debtor at 721 Route 202-206, Suite 200, P.O. Box 5933, Bridgewater, New Jersey 08807 (Attn: Morris S. Bauer, Esq.), in accordance with D.N.J. LBR 9013-1(d).

PLEASE TAKE FURTHER NOTICE that, in the event that timely objections are not filed with the Court and served upon counsel to the Debtor as provided in D.N.J. LBR 9013-1(a) and (f), the Motion shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-1(f), unless timely objections are filed and served upon the appropriate parties, the applicant submits to disposition on the papers.

NORRIS, McLAUGHLIN & MARCUS, PA
Attorneys for Paradigm East Hanover, LLC

By: /s/ Morris S. Bauer
Morris S. Bauer

Dated: January 6, 2015